

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*
LUIS CARLOS CRUZ SOTO	* CASE NO. 08-03899 BKT
Debtor(s)	* CHAPTER 13

FIRST BANK PUERTO RICO	* INDEX
Movant	*
LUIS CARLOS CRUZ SOTO	*
and ALEJANDRO OLIVERAS RIVERA	
as DEBTOR and TRUSTEE	*
Respondent (s)	*

DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF STAY

TO THE HONORABLE COURT:

NOW COMES, LUIS CARLOS CRUZ SOTO, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. Firstbank Puerto Rico ("Firstbank") filed a motion for relief from stay basically alleging that debtor is in arrears in the post-petition direct car loan payments in the sum of \$1,027.80, including late charges.
2. The debtor hereby respectfully submits that he has cured the alleged arrears owed to Firstbank. Attached is copy of manager's check dated August 12, 2011, in the sum of \$1,027.80 to cover the above stated arrears.
3. Based on the aforesaid, debtor hereby respectfully requests this Honorable

Court to deny the motion requesting relief from stay since there exists no "cause" to lift the stay in the present case.

WHEREFORE, debtor respectfully requests from this Honorable Court to deny the motion for relief from stay filed by Firstbank Puerto Rico, docket no. 54

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; Maristella Sanchez Rodriguez, Counsel for Firstbank Puerto Rico; I also certify that a copy of this motion was sent via regular mail to the debtor/respondent Luis Carlos Cruz Soto, PO Box 2017 PMB 540 Las Piedras PR 00771.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 12th day of August, 2011.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR DEBTOR/RESPONDENT
PO BOX 193677 SAN JUAN PR 00919-3677
TEL NO 787-744-7699 FAX NO 787-746-5294
Email: rigueroa@rfclawpr.com

doralbank
Manager's Check

29436

doralbank
BAIRDA BRANCH
CAGUAS, PUERTO RICO 00725

101-7283-2215

DATE 08/12/11

PAY

DORAL BANK 1.027 DOLS 80 CTS

DOLLARS \$ **1,027.80**

TO
THE
ORDER
OF

FIRST BANK

Jose V. Rodriguez 1970

⑈029436⑈ ⑆221572838⑆ 08⑈9000010⑈2⑈

DORAL BANK
MANAGER'S CHECK

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

PRODUCT 535034

29436